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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ABBEY DENTAL CENTER, INC., a Nevada ) Case No. 2:15-cv-02069-GMN-PAL  
Corporation, )  
Plaintiff, ) **STIPULATION AND (PROPOSED)**  
vs. ) **ORDER TO STAY PROCEEDINGS**  
CONSUMER OPINION LLC, a Nevada )  
Limited liability company; DOES 1-10; and )  
ROE ENTITIES 1-10, inclusive, )  
Defendant(s). )

Plaintiff, ABBEY DENTAL CENTER, INC., and Defendant, CONSUMER OPINION LLC, by and through their respective, undersigned counsel, do hereby stipulate and agree as follows:

1. The aforesaid parties are currently engaged in settlement negotiations.
2. In the meantime, to facilitate settlement and to minimize attorneys' fees and other legal expenses, the parties believe that the present civil action should be stayed.

1           3. Therefore, the parties agree that the Court may enter the following order and  
2 request that the Court do so accordingly:

3           a. Except as otherwise provided below, this action shall be stayed for a  
4 period of thirty (30) days from the date this stipulation is filed with the Court.

5           b. The stay shall immediately terminate upon Plaintiff's filing with the  
6 Court, and serving upon Defendant, a notice that Defendant must file an answer to Plaintiff's  
7 complaint in this action or otherwise respond to same in accordance with the *Federal Rules of*  
8 *Civil Procedure* and by no later than twenty-one (21) days after service of the notice.

9           c. The parties stipulate that nothing in this delay shall be deemed to prejudice  
10 Defendant's right to file an Anti-SLAPP motion, under NRS 41.635 *et. seq.*

11           **SO STIPULATED AND AGREED** on this 6<sup>th</sup> day of January, 2016.

12           **THE AMIN LAW GROUP, NV., LTD.**

13           **RANDAZZA LEGAL GROUP, PLLC**

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23           // Marc J. Randazza //  
24           MARC J. RANDAZZA, ESQ.  
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29           Attorney for Defendant

30           **IT IS SO ORDERED.**

31           

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32           UNITED STATES DISTRICT JUDGE

33           Dated: \_\_\_\_\_

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 6<sup>th</sup> of January 2016, I served a true and correct copy of:

**STIPULATION AND (PROPOSED) ORDER TO STAY PROCEEDINGS**, postage fully prepaid and addressed to the following:

serving the following parties via US Mail, postage prepaid;

serving the following parties via CM/ECF;

serving the following parties via facsimile;

serving the following parties via Overnight Express;

Marc J. Randazza, Esq.  
3625 South Town Center Drive  
Las Vegas, NV 89135  
*Attorney for Defendant*

/s/ Teresa Armendariz  
Teresa Armendariz  
An Employee of THE AMIN LAW GROUP, NV., LTD.

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